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Lynne Finley
District Clerk
Collin County, Texas
By Brittany Jagger Deputy
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CAUSE NO. 417-53803-2020

IN THE INTEREST OF	**§**	**IN THE DISTRICT COURT**
	§	
S.L., J.L, AND L.L.,	**§**	**417TH JUDICIAL DISTRICT**
	§	
CHILDREN	**§**	**COLLIN COUNTY, TEXAS**

EMERGENCY MOTION FOR INJUNCTION PROHIBITING COMMUNICATIONS OR OTHER DISSEMINATION OF INFORMATION REGARDING THE PARTIES, PARTICIPANTS, AND SUBJECT MATTER OF THIS CASE

COMES NOW, Rachel Li, Amicus Attorney, who respectfully request the Court to issue on an expedited, emergency basis an Injunction Prohibiting Communications or Other Dissemination of Information Regarding the Parties, Children, Participants, and Subject Matter of this Case ("Gag Order") in this case. In support, the Amicus would show the following:

1. A court may issue an injunction against communications concerning a pending lawsuit if, after a hearing to receive evidence, it finds that 1) an imminent and irreparable harm to the judicial process will deprive litigants of a just resolution of their dispute, and 2) judicial action represents the least restrictive means to prevent that harm. *Grigsby v. Coker*, 904 S.W.2d 619, 620 (Tex. 1995); *Davenport v. Garcia*, 834 S.W.2d 4, 10 (Tex. 1992). A Court may issue an order if the actions of a party causes or can cause imminent harm to a child who is the subject of the suit. TEX. FAM. CODE §105.001.

2. The injunction requested by this motion asks the Court to restrain Petitioner, Michael Jon Long.

3. The Court should issue an injunction or "gag order" because imminent and

irreparable harm to the judicial process will deprive the litigants of a just resolution in this case. Petitioner's and/or his agent's statements are meant to incite violence toward Respondent, her fiancé who is the alleged perpetrator of abuse against S.L., the Judge, and the Amicus Attorney. Inciting violence against Respondent while she is in possession of the children places the children in imminent physical harm. Petitioner's website and social media campaign places a chilling effect on any witnesses who would come forward to testify as to the best interest of the child. Petitioner has created a hostile environment in which professionals are reluctant to treat the children in this case because of the likelihood of libel and slander being propagated against them by Petitioner and his agents. Petitioner's libelous statements have placed the children's best interest in danger, tainted the jury pool, and created a danger to the Court and professionals working in the case.

Petitioner, Michael Jon Long and /or his agents, created several videos of the child S.L., and of Respondent, and posted the videos on social media sites. On or about August 27, 2020, Petitioner and/or his agents began posting the following links on social media.

a. https://www.gofundme.com/f/stand-with-sophie

b. https://youtu.be/ddXuuICIHM4

c. https://youtu.be/7Q83Lu-g9Dc

d. https://youtu.be/IYEKYX5hDyo.

Multiple calls to the Department of Family and Protective Services ("DFPS") were made in the last twenty-four hours, and a multitude of calls were placed to the Frisco Police Department.

Petitioner and/or his agents launched a social media campaign posting photographs and videos of S.L., alleging Respondent and Respondent's fiancé (and other unnamed individuals) are sexually and physically abusing the child, and posting the Respondent and Resondent's fiance's full names and home addresses. Agents of Petitioner are calling for people to join protests and a

"manhunt" to bring "justice" to S.L. Some posts go so far as to say that ammunition is available, and that people should protest at Respondent's home. Agents of Petitioner posted the names and addresses of Respondent and her fiancé on social media and called for a protest and a manhunt and offered ammunition for same. Agents of Petitioner posted the name of the attorneys, visiting judge, and amicus attorney on social media, and responses to the posts call for violence and murder against all of those involved.

The child has a right to privacy of her mental health and medical information. It is a violation of the child's privacy for any person to share the child's mental health and medical information, and the sharing of such information over the internet will cause and likely has caused irreparable harm to the child and the other children of this suit.

Petitioner and/or his agents posted libelous statements on social media against employees of DFPS, the amicus attorney, and others in this case. The defamation campaign created by Petitioner and his agents is causing imminent and irreparable harm to the children who are the subjects of this case and to the judicial process, which will deprive the children of a just resolution in this case.

4. The Amicus requests the Court waive the three-day notice requirement of TEXAS RULES OF CIVIL PROCEDURE 21 and hear this matter immediately to protect the health and welfare of the children who are the subjects of this suit.

5. The Court should issue an injunction prohibiting Petitioner and his agents from posting videos and photographs of the children, names and personal information of the parties, witnesses, professionals, attorneys, and judges in the case.

6. The Court should issue an injunction prohibiting Petitioner and his agents from posting comments or language that may cause violence towards a party, witness, professional, attorney, or judge in the case.

7. The Court should issue an order requiring Petitioner and his agents to remove all videos and photographs of the children related to any outcry of abuse by a child who is the subject of this case, and all other orders necessary to protect the children and a just resolution in this case.

The Amicus Attorney prays the Court grant this motion and the relief requested herein. The Amicus Attorney prays for all relief under law and equity. The Amicus Attorney prays for general relief.

Respectfully submitted,

By:

Rachel Li
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Certificate of Service

I certify that a true copy of this document was served in accordance with rule 21a of the Texas Rules of Civil Procedure on the representative attorney for each party on August 30, 2020.

Rachel Li

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